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Attorneys for Plaintiff
ANDREA X. BULOW

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Plaintiffs JERRY CHU and ANDREA X.
BULOW, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

WELLS FARGO INVESTMENTS, LLC,

Defendants.

Case Nos. C-05-04526 MHP;
C-06-7924 MHP

Consolidated Action

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING DEADLINES**

STIPULATION

WHEREAS, following the October 29, 2007 case management conference, the Court issued a minute order setting forth deadlines for non-expert discovery and dispositive motions;

WHEREAS, according to the Court's minute order, the deadline for completing non-expert discovery was May 1, 2008, and the deadline for filing dispositive motions is May 19, 2008, with oppositions due on June 2, 2008, replies due on June 9, 2008, with the hearing on dispositive motions is set for 2:00 p.m. on June 23, 2008.

WHEREAS, since the Court's minute order, the parties met and conferred extensively regarding Defendant's objection to an interrogatory requesting the contact information of all putative class members;

WHEREAS, the parties were unable to informally resolve this dispute and requested a discovery conference before the Court on March 24, 2008;

WHEREAS, due to the schedules of the parties and the Court's calendar, the discovery dispute could not be heard until April 15, 2008;

WHEREAS, given that the dispute regarding the disclosure of putative class member contact information was not heard until April 15, 2008 and on April 30, 2008 Defendant produced updated contact information, Plaintiffs have not had an opportunity to complete discovery related to these putative class members;

NOW, THEREFORE, Plaintiffs and Defendant, through their undersigned respective counsel, stipulate and request that the Court approve the following revised schedule:

9/22/08	Last day by which non-expert class certification discovery must be completed
10/20/08	Last day to file dispositive motions
11/10/08	Last day to file oppositions to dispositive motions
11/24/08	Last day to file replies in support of dispositive motions
12/08/08	Hearing on dispositive motions at 2:00 p.m.

To avoid prejudice to both parties, GOOD CAUSE exists to modify the deadlines in this action as described herein.

1 Dated: May 6, 2008

MORGAN LEWIS & BOCKIUS LLP

2
3 By: 

4 Barbara Antonucci
5 Attorneys for Defendant
6 WELLS FARGO INVESTMENTS, LLC

7 Dated: May 6, 2008

HOFFMAN & LAZEAR

8 By: 

9 Morgan Mack
10 Attorneys for Plaintiff
11 JERRY CHU

12 Dated: May 6, 2008

SCOTT COLE & ASSOCIATES, APC

13 By: 

14 Carrie Lin
15 Attorneys for Plaintiff
16 ANDREA X. BULOW

17 **ORDER**

18 In light of the foregoing STIPULATION of the parties, the Court ORDERS that the
19 deadlines in this case are hereby modified as follows:

20 9/22/08	Last day by which non-expert class certification discovery must be 21 completed
22 10/20/08	Last day to file dispositive motions
23 11/10/08	Last day to file oppositions to dispositive motions
24 11/24/08	Last day to file replies in support of dispositive motions
25 12/08/08	Hearing on dispositive motions at 2:00 p.m.

26 Dated: 5/8/2008

27 HON. MARILYN H. PATEL
28 U.S. District Court

